



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ONE CONGRESS STREET, SUITE 1100
BOSTON, MA 02114-2023**

December 3, 2004

Mr. Andrew T. Silfer
Corporate Environmental Programs
General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's Floodplain Residential and Non-Residential Properties Adjacent to 1 ½ Mile Reach of Housatonic River Work Plan Addendum- Phase 4 Floodplain Properties, Group 4A
GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the *Floodplain Residential and Non-Residential Properties Adjacent to 1 ½ Mile Reach of Housatonic River Work Plan Addendum- Phase 4 Floodplain Properties, Group 4A* (Work Plan Addendum), submitted on July 14, 2004. The Report is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the Work Plan Addendum subject to the conditions presented below.

1. The "top of bank" boundary between the 1.5 Mile Reach Removal Action and the GE floodplains is outdated. In all future submittals, GE shall use the current boundary which was agreed to by EPA and GE. Maps delineating the agreed upon boundary were transmitted to GE on November 10, 2004.
2. Parcel I7-1-101 (Fred Garner Park), is approximately 10 acres and includes both open and wooded spaces. Recreational exposure is not equally likely throughout this parcel, and therefore, this parcel should be viewed as two separate evaluation areas as shown in the attached figure. In all future submittals, GE shall include separate averaging areas for Fred Garner Park consistent with the boundaries shown in the figure that EPA provided to GE on November 16, 2004.

3. EPA believes that some additional PCB sampling within the Phase 4, Group 4A properties is necessary. Specifically, GE shall include additional PCB borings in the following areas: between 4A-SS-5 and 4A-SS-4, 35 feet south of F0220601, between F0219201 and F0219002, between RB03211 and F032100, and near F0220403.
4. Based on the PCB analytical results collected to date, it is likely that PCB soil removal will be necessary on portions of Fred Garner Park. Consequently, GE shall provide an Appendix IX+3 sampling proposal to EPA that will include a sufficient number of samples to characterize the Appendix IX constituents within Fred Garner Park.

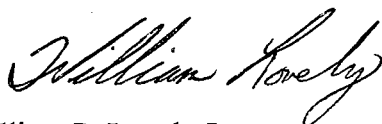
GE shall initiate the PCB sampling presented in this Work Plan Addendum, as modified by EPA's conditions, following receipt of this letter. GE shall also provide the Appendix IX+3 sampling proposal described above to EPA within 15 days of the date of this letter. GE shall initiate the sampling presented in the Appendix IX+3 sampling proposal following receipt of EPA's conditional approval of that proposal. Finally, GE shall submit a Pre-Design Investigation Report that includes the results of both PCB and Appendix IX+3 sampling within three months of the date of EPA's approval of the Appendix IX+3 sampling proposal for Fred Garner Park.

The schedule presented above would be subject to revision if: 1) the property owners raise new issues affecting access that would delay the timely completion of these investigations; 2) weather conditions or EPA's approval of the Appendix IX+3 sampling proposal preclude the timely completion of the sampling; or 3) EPA's activities relating to the 1 ½ Mile Reach Removal Action preclude the collection of the samples at the designated locations.

EPA reserves its right to perform and/or require additional sampling and/or Response Actions, if necessary, in the floodplain parcels located in the 1 ½ Mile Reach of the Housatonic River to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1240.

Sincerely,



William P. Lovely Jr.
Remedial Project Manager
GE/Housatonic River Project

cc: Richard Gates, GE
Michael Carroll, GE
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Property Owner- Parcel I7-1-2
Caleb Mitchell, Conservation Commission
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